

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	x		06/16/2025
2. Rule 26(a)(1) disclosures exchanged			08/08/2025
3. Requested:			
a. Medical records authorization	x		
b. CPL § 160.50 releases for arrest records	x		
c. Identification of John Doe/Jane Doe defendants		x	
4. Procedures for producing Electronically Stored Information (ESI) discussed		x	
5. Protective Order to be submitted for court approval (see Standing Protective Order on the Chambers website)	x		Order Entered 4/3/2025 (Dkt. 42)
B. SETTLEMENT PLAN			
1. Plaintiff to make settlement demand	x		Vines 12/09/2024 Carrion 12/11/2024
2. Defendant to make settlement offer	x		03/10/2025
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)		x	
4. Settlement Conference (proposed date)		Not at this time	
C. PROPOSED DEADLINES			
1. Motion to join new parties			09/09/2025
2. Motion to amend pleadings			09/09/2025
3. Initial documents requests and interrogatories			09/05/2025
4. All fact discovery to be completed (including disclosure of medical records)			01/12/2026
5. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			01/20/2026

6. Expert discovery (only if needed)		<i>Check here if not applicable</i> <input checked="" type="checkbox"/>	
Plaintiff expert proposed field(s) of expertise:			
Defendant expert proposed field(s) of expertise:			
		DONE	NOT APPLICABLE
a. Affirmative expert reports due		X	
b. Rebuttal expert reports due		X	
c. Depositions of experts to be completed		X	
7. Completion of ALL DISCOVERY (if different from C.4)		X	
8. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated			
9. If any party seeks a dispositive motion , date to a. file request for pre-motion conference (if required), or b. file briefing schedule for the motion			02/11/2026
10. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)		X	02/11/2026

D. CONSENT TO MAGISTRATE JUDGE JURISDICTION

1. All parties consent to Magistrate Judge jurisdiction for dispositive motions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY

1. Motion for collective action certification in FLSA cases		X	
a. Response due		X	
b. Reply due		X	
2. Motion for Rule 23 class certification		X	
a. Response due		X	
b. Reply due		X	

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

Marcia M. Henry
MARCIA M. HENRY
 United States Magistrate Judge

July 28, 2025

Date